

1 CHARLES R. GOODWIN, ESQ.
2 Nevada Bar No. 14879
3 **GOODWIN LAW GROUP, PLLC**
4 3100 W Charleston Blvd
5 Las Vegas, NV 89102
Telephone (702) 472-9594
charles@goodwinlawgroup.net
6 Attorney for plaintiff Ramon Muric-Dorado

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RAMON MURIC-DORADO,

Plaintiff,

v.

LVMPD, et. al.,

Defendants.

CASE NO. 2:18-cv-01184-JCM-EJY

**PROPOSED DISCOVERY PLAN AND
SCHEDULING ORDER**

Plaintiff, Ramon Muric Dorado, (hereafter “Plaintiff”) and Defendant LVMPD, et.al. (hereafter “Defendant,” collectively with Plaintiff the “Parties”), hereby submit the following Proposed Discovery Plan and Scheduling Order.

Pursuant to Local Rule 26-1, the parties submit their proposed discovery plan and scheduling order.

1. **Pre-Discovery Disclosures:** Pursuant to FRCP Rule 26(a)(1), the parties will make their initial disclosures, including but not limited to any computation(s) of damages, by **Friday November 11th, 2021**.
2. **Areas of Discovery:** Discovery should include, but not limited to, all claims and defenses allowed pursuant to the Federal Rules of Civil Procedure.
3. **Discovery Plan:** The parties have agreed to a six (6) month discovery period beginning on the date of September 6, 2021. The deadlines herein have been calculated from that date.

1 4. **Discovery Cut-Off Dates:** The parties propose that discovery must be commenced
 2 and completed no later than **Monday, March 7, 2022**. 181¹ days after September 6,
 3 2021.

4 5. **Amending the Pleadings and Adding Parties:** The last day to file motions to amend
 5 the pleadings or add parties shall not be later than 90 days prior to the close of
 6 discovery. The last date for filing motions to amend the pleadings or add parties shall
 7 be **Tuesday, December 7, 2021**.

8 6. **FRCP 26(a)(2) Disclosures (Experts):** The last date for the disclosure of expert
 9 witness shall be 60 days before the discovery cut-off date. In this action, the last date
 10 for the disclosure of experts shall be **Thursday January 6, 2022**. The last date for
 11 disclosure of rebuttal experts shall be **Monday, February 7, 2022**.

12 7. **Dispositive Motions:** The last date for filing dispositive motions shall not be later
 13 than 30 days after the discovery cut-off date. The last day for filing dispositive motions
 14 shall be **Wednesday, April 6, 2022**.

15 8. **Pre-trial Order:** The Joint Pre-trial Order shall be filed no later than 30 days after the
 16 date set for filing dispositive motions. The joint pretrial order shall be filed on or
 17 before **Friday, May 6, 2022**. If dispositive motions are filed, the date for filing the
 18 Joint Pre-trial Order shall be suspended 30 days after the decision of the dispositive
 19 motions or further order of the court.

20 9. **Interim Status Reports:** The last day for filing an interim status report shall be 60
 21 days before discovery cut-off. The last day for filing the interim status report shall be
 22 **Thursday, January 6, 2022**.

23 10. **FRCP 26(a)(3) Disclosures:** The disclosures required by FRCP 26(a)(3) and any
 24 objections thereto shall be included in the pre-trial order.

25 11. **Stipulations Regarding Limitations or Conditions or Additional Discovery:** The
 26 parties will proceed to engage in and supplement all discovery as permitted under the

28 ¹ The date occurring 180 days after the 26(f) conference falls on Sunday, April 14, 2019. The parties agree to move
 this deadline to the next judicial day.

Federal Rules of Civil Procedure and the Local Court Rules of the District of Nevada, including but not limited to depositions, interrogatories, requests for production of documents, requests for admissions, and expert disclosures.

12. Later Appearing Parties: A copy of this Discovery Plan and Scheduling Order shall be served on any person served after it is entered or, if additional defendants should appear, within five (5) days of their first appearance. This Discovery Plan and Scheduling Order shall apply to such later-appearing party and/or parties, unless this Court, on motion and for good cause shown, orders otherwise.

13. Extension or Modifications of the Discovery Plan and Scheduling Order: Local Rule 26-4 governs all applications to extend any of the dates set out herein. Any motion or stipulation to extend a deadline set forth herein shall be received by the Court no later than twenty-one (21) days before the expiration of the subject deadline.

11

11

11

111

111

111

111

111

111

111

11

11

11

11

11

1 **14. Statements of Parties' Positions On Points In Dispute or Other Discovery Issues:**

2 None.

3 DATED this 3rd day of September 2021.

4 DATED this 3rd day of September 2021.

5 **GOODWIN LAW GROUP, PLLC**

6 **KAEMPFER CROWELL**

7 By: /s/ Charles R Goodwin

8 Charles R. Goodwin, Esq.
9 Nevada Bar No. 14879
10 3100 W Charleston Blvd
11 Las Vegas, NV 89102
12 Telephone (702) 472-9594
13 charles@goodwinlawgroup.net
14 Attorney for plaintiff Ramon Muric-
15 Dorado

16 By: /s/Lyssa S. Anderson

17 Lyssa S. Anderson, Esq.
18 Nevada Bar No. 5781
19 Ryan W. Daniels, Esq.
20 Nevada Bar No. 13094
21 Kristopher John Kalkowski, Esq.
22 Nevada Bar No. 14892
23 1980 Festival Plaza Dr. Suite 650
24 Las Vegas, NV 89135
25 Telephone (702) 792-7000
26 landerson@kcnvlaw.com
27 rdaniels@kcnvlaw.com
28 kkalkowski@kcnvlaw.com
29 Attorneys for Defendant LVMPD

30 DATED this 3rd day of September 2021.

31 **LAURIA TOKUNAGA GATES & LINN,
32 LLP**

33 By: /s/ Paul A Cardinale

34 Paul A. Cardinale
35 1755 Creekside Oaks Dr., Ste 240
36 Sacramento, CA 95833
37 916-492-2000
38 916-492-2500 (fax)
39 pcardinale@ltglaw.net
40 Attorney for Defendant NaphCare,
41 Inc.

42 ORDER

43 IT IS SO ORDERED:

44 
45 U.S. MAGISTRATE JUDGE

46 Dated: September 8, 2021